

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- - - - -
UNITED STATES OF AMERICA

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: MAR 19 2007

- v. -

NATASHA SINGH,
a/k/a "Beatris Rodrigues,"
Defendant.

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: SUPERSEDING INFORMATION
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: S5 05 Cr. 1067 (KMK)
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x

COUNT ONE

(Bank Fraud Conspiracy)

The United States Attorney charges:

1. From at least in or about December 2002 through in or about August 2005, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, together with others known and unknown, unlawfully, willfully, and knowingly, would and did execute, and attempt to execute, a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits,

assets, securities, and other property owned by, and under the custody and control of, said financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendant and her co-conspirators defrauded Wachovia Bank, Bank of America, and Community Bank of Broward, among other banks, by depositing stolen, altered and counterfeit checks drawn on accounts at such banks, as well as proceeds from such checks, into accounts at numerous banks, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about April 5, 2005, Douglas Shyne sent a check made payable to "Steve Riddick Sports Training Inc." in the amount of approximately \$375,000 by Federal Express from New York, New York, to a co-conspirator not named as a defendant herein ("CC-1"), who is a friend of Douglas Shyne, in Virginia Beach, Virginia.

b. On or about April 29, 2005, NATASHA SINGH deposited into her Commerce Bank account a check in the amount of approximately \$8,500, drawn on Ephraim Richardson's JP Morgan

Chase bank account.

c. On or about August 3, 2005, NATASHA SINGH issued at least approximately three checks to herself, in the total aggregate amount of approximately \$59,500, drawn on the Café Lounge Account.

(Title 18, United States Code, Section 1349.)

COUNTS TWO THROUGH TEN

(Bank Fraud)

The United States Attorney further charges:

4. On the approximate dates set forth below, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, said financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendant defrauded Wachovia Bank, Bank of America, and Community Bank of Broward, among other banks, by depositing stolen, altered and counterfeit checks drawn on accounts at such banks, as well as proceeds from such checks, into accounts at numerous banks, as set forth below.

COUNT	Approx. Dates	Approx. Check Amount*	Bank**
TWO	3/04-8/04	\$775,000 stolen check	Wachovia Bank
THREE	10/04-12/04	\$150,000	Bank of America
FOUR	12/04-5/05	Three checks totaling \$905,000	Wachovia Bank
FIVE	3/05-5/05	Two checks totaling \$1 million	Wachovia Bank
SIX	3/05-5/05	Two checks totaling \$775,000	Wachovia Bank, Community Bank of Broward
SEVEN	6/05-7/05	\$175,000	Wachovia Bank
EIGHT	5/05-7/05	\$375,000	Bank of America
NINE	6/05	\$180,000	Wachovia Bank
TEN	7/05-8/05	Two checks totaling \$150,000	Bank of America

(Title 18, United States Code, Sections 1344 and 2.)

* Unless otherwise noted, the checks listed are counterfeit and/or altered.

** The bank listed is the FDIC-insured financial institution on which the corresponding check is drawn.

COUNT ELEVEN

(Money Laundering Conspiracy)

The United States Attorney further charges:

5. From at least in or about 2003 through in or about August 2005, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a) (1) (B) (i) .

6. It was a part and an object of the conspiracy that from at least in or about 2003 through in or about August 2005, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved proceeds of specified unlawful activity, to wit, bank fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a) (1) (B) (i) .

OVERT ACTS

7. In furtherance of the conspiracy and to effect the illegal object thereof, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. From on or about July 28, 2004, through on or about August 16, 2004, NATASHA SINGH deposited approximately four checks, totaling approximately \$180,000, drawn on the Citibank account of Christine Richardson, into an account at the Bank of America (formerly Fleet) maintained in the name of Douglas New York Five Star Coffee, a shell corporation used to launder the proceeds of the fraudulent activity.

(Title 18, United States Code, Section 1956(h).)

COUNT TWELVE

(Money Laundering Conspiracy)

The United States Attorney further charges:

8. From at least in or about March 2005 through in or about May 2005, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

9. It was a part and an object of the conspiracy that

from at least in or about March 2005 through in or about May 2005, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved proceeds of specified unlawful activity, to wit, bank fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

OVERT ACTS

10. In furtherance of the conspiracy and to effect the illegal object thereof, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about April 5, 2005, Douglas Shyne sent a check made payable to "Steve Riddick Sports Training Inc." in the amount of approximately \$375,000 by Federal Express from New York, New York, to CC-1, who is a friend of Douglas Shyne, in Virginia Beach, Virginia.

b. On or about April 25, 2005, NATASHA SINGH deposited into her Commerce Bank account a check in the amount of approximately \$72,400, drawn on Jason Watler's Citibank account.

c. On or about April 29, 2005, NATASHA SINGH deposited into her Commerce Bank account a check in the amount of approximately \$8,500, drawn on the bank account of Ephraim Richardson maintained at JP Morgan Chase Bank.

(Title 18, United States Code, Section 1956(h).)

COUNT THIRTEEN

(Money Laundering Conspiracy)

The United States Attorney further charges:

11. From at least in or about June 2005 through in or about August 2005, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

12. It was a part and an object of the conspiracy that from in or about June 2005 through in or about August 2005, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of

unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved proceeds of specified unlawful activity, to wit, bank fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

OVERT ACTS

13. In furtherance of the conspiracy and to effect the illegal object thereof, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about June 8, 2005, NATASHA SINGH deposited a counterfeit check in the amount of approximately \$180,000, drawn on an account at Wachovia Bank, into the Commerce Bank account of Nathaniel Shyne, located in New York, New York.

b. On or about August 3, 2005, NATASHA SINGH issued at least approximately three checks to herself, in the total aggregate amount of approximately \$59,500, drawn on the Café Lounge Account.

(Title 18, United States Code, Section 1956(h)).

COUNT FOURTEEN

(False Statements)

The United States Attorney further charges:

14. In or about May 2004, in the Southern District of New York and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, the agency then known as the Immigration and Naturalization Service ("INS") (now known as the U.S. Citizenship and Immigration Services), unlawfully, knowingly, and willfully did falsify, conceal, and cover up by trick, scheme, and device material facts, and did make materially false, fictitious, and fraudulent statements and representations, and did make or use and false writing or document knowing the same to contain a false, fictitious, or fraudulent statement or entry, to wit, NATASHA SINGH claimed to INS officials on or about April 20, 2004 with the agency then known as the Immigration and Naturalization Service (now known as the U.S. Citizenship and Immigration Services), that she had never committed a crime or offense for which she had not been arrested, whereas in fact, she had committed numerous offenses, as charged in Counts One through Thirteen herein.

(Title 18, United States Code,
Section 1001(a)(1), (a)(2) & (a)(3).)

FORFEITURE ALLEGATION

15. As a result of committing one or more of the foregoing offenses alleged in Counts One through Thirteen of this Information, NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the fraud offenses, including but not limited to approximately \$80,755.66 and approximately \$50,000 in jewelry, furniture, clothing, and appliances.

Substitute Assets Provision

16. If the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1344.)



MICHAEL J. GARCIA
United States Attorney

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Defendant.

SUPERSEDING INFORMATION

S5 05 Cr. 1067 (KMK)

**(Title 18, United States Code, Sections 1344, 1349,
1956(a)(1)(B)(I) and (h), 1001(a), and 2).**

**MICHAEL J. GARCIA
United States Attorney.**
